

John P. Aldrich, Esq. (Resident Counsel)  
Nevada State Bar #6877  
Aldrich Law Firm, Ltd.  
7866 West Sahara Ave.  
Las Vegas, NV 89117  
Tel: (702) 853-5490  
jaldrich@johnaldrichlawfirm.com

*Liaison Counsel for [Proposed]  
Lead Plaintiff Carlos Marina*

Reed R. Kathrein (to be admitted *pro hac vice*)  
Lucas E. Gilmore (to be admitted *pro hac vice*)  
HAGENS BERMAN SOBOL SHAPIRO LLP  
715 Hearst Avenue, Suite 202  
Berkeley, CA 94710  
Telephone: (510) 725-3000  
Facsimile: (510) 725-3001  
reed@hbsslaw.com  
lucasg@hbsslaw.com

*Attorneys for [Proposed]  
Lead Plaintiff Carlos Marina*

[Additional counsel on signature page]

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

TAD SCHLATRE, Individually and On  
Behalf Of All Others Similarly Situated,

Plaintiff,

v.

MARATHON DIGITAL HOLDINGS, INC.,  
f/k/a MARATHON PATENT GROUP, INC.,  
MERRICK D. OKAMOTO, FREDERICK G.  
THIEL, and SIMEON SALZMAN,

Defendants.

Case No.: 2:21-cv-02209-RFB-NJK

**CLASS ACTION**

**DECLARATION OF JOHN P.  
ALDRICH IN SUPPORT OF  
MOTION TO APPOINT CARLOS  
MARINA AS LEAD PLAINTIFF,  
AND APPROVE HIS SELECTION  
OF LEAD COUNSEL**

1 I, John P. Aldrich, declare as follows:

2 1. I am a partner at the law firm Aldrich Law Firm, Ltd., Liaison Counsel for  
3 class member Carlos Marina (“Movant”). I am an attorney licensed to practice law in the  
4 State of Nevada. I make this declaration in support of Movant’s Motion to Appoint Movant  
5 as Lead Plaintiff and Approve Movant’s Selection of Lead Counsel. I have personal  
6 knowledge of the matters stated herein and, if called upon, I could and would competently  
7 testify thereto.

8 2. Attached are true and correct copies of the following exhibits:

9 Exhibit A: Notice of pendency of class action published in *GlobeNewswire*, a  
10 national business-oriented wire service, on December 17, 2021;

11 Exhibit B: Hagens Berman’s firm résumé;

12 Exhibit C: Aldrich Law Firm’s résumé;

13 Exhibit D: Chart of Movant’s estimated losses;

14 Exhibit E: Movant’s Declaration; and

15 Exhibit F: Movant’s sworn Certification.

16 I declare under penalty of perjury under the laws of the United States of America  
17 that the foregoing is true and correct. Executed this 15th day of February 2022, at Las  
18 Vegas, Nevada.

19  
20 /s/ John P. Aldrich  
21 JOHN P. ALDRICH  
22  
23  
24  
25  
26  
27  
28

**CERTIFICATE OF SERVICE**

I hereby certify that on February 15, 2022, I electronically filed the foregoing document using the CM/ECF system which will send notification of such filing to the e-mail addresses registered in the CM/ECF system, as denoted on the Electronic Mail Notice List.

**ALDRICH LAW FIRM, LTD.**

/s/John P. Aldrich  
John P. Aldrich, Esq.